

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Et al.,**

Plaintiffs

v.

**COMMONWEALTH OF PUERTO RICO
Et al.,**

Defendants

CIVIL NO. 12-2039 (GAG)

CIVIL RIGHTS

**JOINT REQUEST FOR EXTENSION OF TIME
TO SUBMIT PROPOSED BUDGET FOR IMPLEMENTATION
OF THE PROPOSED AGREEMENT**

TO THE HONORABLE COURT:

COMES NOW the Parties to this case, via the attorneys of record, and very respectfully state and pray:

1. By Order of February 6, 2013, this Court ordered the Parties to submit on or before March 15, 2013, a joint proposed budget for implementation of the proposed agreement. **D. 15.**

2. The Parties have been working arduously toward said objective. Counsel and experts for the Parties met for extended working sessions on February 27 and 28, 2013; and are scheduled to meet again this March 19 and 20, 2013 to reach final agreement on the wording of the Accord. The Reform Committee of the Police, in turn, has also been working arduously to calculate a tentative budget for implementation of the Accord.

Despite best efforts, however, this moment it is still premature to communicate a joint proposed budget for implementation of the proposed agreement. While the Police is culminating its efforts, the different governmental actors involved in the budgetary and financial dimensions of this case need to converge on a feasible long range funding plan with the objective of complying with the totality of the Accord. At present, furthermore, the Commonwealth defendants are in the midst of assessing the full dimension of serious fiscal challenges affecting both the continent and the island. This overview is required for the allocation of short and long term resources and for the provision of wide-ranging, viable and permanent solutions to ongoing responsibilities. The Commonwealth countenances full compliance with the Accord; yet, it needs to locate these financial commitments within the total monetary reality of the island

3. For these reasons, the Parties respectfully request an additional period of time to comply with the Order concerning the implementation of the Accord. The Parties suggest that an extension of time be allowed until no less than April 30, 2013. It is expected by that time that the Commonwealth budget should be molded, and fiscal plans for the next quatrain should be discernible. A viable budget proposal should be ready by that time.

WHEREFORE, the Parties respectfully request this Honorable Court to grant them an enlargement of time until no less than April 30, 2013 to inform the Court of the proposed budget for implementation of the proposed agreement.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this March 15, 2013,

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NOTIFICATION

On this date, the signatory to this motion has filed it with the Clerk of the Court via the CM/ECF that shall relay it to all counsel of record.